

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

DANA STEPHENSON )  
v. Plaintiff, ) Case No. 20-cv-01332  
EXCLUSIVE MOTOR-SPORTS, )  
LLC, et al. )  
Defendants. )

**MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to Rule 1:3 of the Local Rules of the United States Court for the Southern District of New York, Thomas R. Breeden hereby moves this Court for an Order for admission to practice Pro Hac Vice to appear as counsel for Dana Stephenson in the above-captioned action.

1. Applicant's residential address:

Thomas R. Breeden  
101 Smith Heritage Lane  
Boston, Virginia 22713

2. Applicant's office address, telephone number, facsimile number and email address is:

Thomas R. Breeden  
Thomas R. Breeden, P.C.  
10326 Lomond Drive  
Manassas, Virginia 20109  
Telephone No.: (703) 361-9277  
Facsimile No.: (703) 337-0441  
Email: [trb@tbreedenlaw.com](mailto:trb@tbreedenlaw.com)

3. I am in good standing of the bar(s) of the state(s) of and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been suspended disbarred or denied admission or readmission by any court. My firm has been censured by a court, based on an associate's filings in a

case. I have attached the affidavit pursuant to Local Rule 1.3.

- Supreme Court of Virginia (1991);
- U.S. District Court for the Eastern District of Virginia (1992); and
- U.S. District Court for the Western District of Virginia (1999).

4. Thomas R. Breeden is in good standing and eligible to practice in all courts to which is admitted, see attached.

5. Local counsel's address, telephone number, facsimile number and email address is:

Brian L. Bromberg  
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26 Broadway, 21<sup>ST</sup> Floor  
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The required fee of \$200.00 was submitted on June 12, 2020.

By: /s/Thomas R. Breeden  
One of Plaintiff's Attorneys

Dated: June 23, 2020

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 23<sup>RD</sup> day of June, 2020, a copy of the foregoing Motion for Admission Pro Hac Vice was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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Notice of this filing will be sent to the following parties by U.S. mail, first class postage pre-paid, on this 23<sup>RD</sup> day of June, 2020.

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By: /s/Thomas R. Breedon  
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